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IN THE  
United States District Court for the  
Eastern District of North Carolina

PETER A. MOORE, JR., CLERK  
US DISTRICT COURT, EDNC

Southern Division

ANDREW U. D. STRAW,  
*Plaintiff,*

v.

UNITED STATES OF AMERICA,  
*Defendant.*

) Case#: 7:23-cv-162-BO-BM  
)  
) Hon. Terrence Boyle  
) Judge Presiding  
) Hon. Brian Meyers  
) Magistrate Judge  
)  
) JURY TRIAL DEMANDED

**MOTION FOR LEAVE TO FILE MOTION TO APPOINT ME COUNSEL  
FOR MY MOTHER'S ESTATE'S WRONGFUL DEATH CLJA CLAIM AND MY  
DAUGHTER'S PERSONAL INJURY CLJA CLAIM**

COMES NOW, *pro se Plaintiff* ANDREW U. D. STRAW (hereinafter "Plaintiff"), individually, request leave to make this MOTION under the inherent powers of the Court to regulate its own bar, and to appoint me counsel for my mother's estate and my disabled daughter for CLJA purposes:

**FACTS & REQUESTS**

1. Andrew U. D. Straw was born at Camp LeJeune Naval Hospital (CLNH) on March 19, 1969.<sup>1</sup>
2. For his birth, he and his mother were in the Naval Hospital as in-patients from March 19-22, 1969. They were present either in utero or in person from 12/19/1968 to 7/24/1970, during the middle of the Camp LeJeune toxic time.

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<sup>1</sup> *Straw v. Wilkie*, 32 Vet. App. 374, 375 (2020) *Straw v. Wilkie*, 20-2090, 843 F. App'x 263 (Fed. Cir. 1/15/2021).

3. It is a biological fact that when I was present at Camp LeJeune during the toxic water time and was exposed to the poisonous water, ½ of my daughter's genes were also present in my nascent gametes.
4. My mother died of a Camp LeJeune breast cancer while I was a 2L in Law School at IU-Maurer School of Law in Bloomington, Indiana. I was on the Dean's List in the year my mother died and was the Dean's research assistant.<sup>2</sup>
5. **Female breast cancer** is listed on the Leadership Counsel webpage FAQ.
6. <https://camplejeunecourtinfo.com/faq/>
7. My daughter was the first person in my family to have scoliosis requiring treatment, so severe that she used a torso brace from ages 6 to 13, nearly 24 hours a day that entire time. Then, she required a major open spine surgery to correct the severe curvature of her spine and halt the progression with a titanium rod and screws. She was 13 in 2011 when this was done.
8. My Navy JAG CLJA Claim#: **CLS23-004519**
9. My mother's Estate's Navy JAG CLJA Claim#: **CLS23-005185**
10. Both of these were filed in 2022.
11. I filed my daughter's Navy JAG CLJA Claim on **8/20/2023**. It will be administratively ripe for a lawsuit here on **February 26, 2024**, the 27<sup>th</sup> anniversary of my mother's death (**2/26/1997**).
12. These three claims are integrally connected with the same fact background.

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<sup>2</sup> *Straw v. LinkedIn*, 5:22-cv-7718-EJD (N.D. Cal. 2023) (**Dkt. 22-35**)

<https://www.courtlistener.com/docket/66619947/straw-v-linkedin-corp/>

13. Since “female breast cancer” is already on the list of conditions Leadership Counsel say is connected to the poisons, that condition is likely to result in a bellwether trial. Of course, in this case, the condition resulted in death, so this is a wrongful death case.
14. Animal studies have shown that the TCE in the water at Camp LeJeune caused scoliosis in the animals.<sup>3</sup>
15. My mother’s cancer started in the breast, spread to her spine, then lungs, then brain before killing her. I was there and watched her decline and then die, along with her new husband, who experienced this after marrying her in 1996.
16. Thus, 3 generations of my family have experienced injury to the CNS, spine, and brain.
17. I have been diagnosed (Dkt. 55, pp. 3-4) with **6 different critical and painful mental or CNS conditions** (bipolar disorder, depression, schizophrenia, anxiety, “autistic thinking,” and migraine headaches with auras).<sup>4</sup> I was in a

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<sup>3</sup> [https://hero.epa.gov/hero/index.cfm/reference/details/reference\\_id/632863](https://hero.epa.gov/hero/index.cfm/reference/details/reference_id/632863)

<https://www.science.gov/topicpages/t/taste-blind+medaka+fish>

<sup>4</sup> *Straw v. LinkedIn*, 5:22-cv-7718-EJD (N.D. Cal. 2023) (Dkts. 22-29, 22-30, 22-31, 22-37)

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car accident<sup>5</sup> made 66% more likely<sup>6</sup> by having this bipolar brain condition, according to medical research, but insurance did not cover the full damage.

18. Stigma based on my Camp LeJeune bipolar and other conditions (Dkt. 58, ¶¶ 17 & 19, FN3, FN4, & FN5) has wrecked my law career.

19. I live with both my legs broken, my pelvis broken, and my ribs, hand, and facial bones broken because of that reckless driver as I drove to the Indiana Supreme Court to work. Instead of compassion, just a few months later, the Court fired me with insults. That hostility led to suspension of my Indiana law license in 2017 and never giving it back. (See, Dkt. 57-4, 57-2).

20. The poverty my former employer, the Indiana Chief Justice, inflicted on me caused me to be unable to get malpractice insurance in Virginia and eventually my UNSANCTIONED for 22 years VSB law license was too expensive for me to maintain and thus I had to resign it in 2021 after earning it while working as corporate counsel for a WWII silver star winner and billionaire.<sup>7</sup> And of course, I earned my Indiana law license in 2002 while working for the Indiana Chief Justice, providing services to 400+ courts in the State of Indiana,

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<sup>5</sup> *Straw v. LinkedIn*, 5:22-cv-7718-EJD (N.D. Cal. 2023) (Dkts. 22-26, 22-27, 22-28)

<https://www.courtlistener.com/docket/66619947/straw-v-linkedin-corp/>

<sup>6</sup> (Dkt. 58, ¶ 20, FN6)

<sup>7</sup> *Straw v. LinkedIn*, 5:22-cv-7718-EJD (N.D. Cal. 2023) (Dkt. 22-42)

<https://www.courtlistener.com/docket/66619947/straw-v-linkedin-corp/>

suffering from 6 Camp LeJeune mental illnesses, and with bones broken from head to ankle from that reckless driver on the way to the Supreme Court to work. There is literally no one else like me in Indiana judicial branch history. Indiana treated that uniqueness and exceptional sacrifices from the crimes<sup>8</sup> of others as **a reason to ruin my life and my career**. They forced me into poverty, living on SSDI.<sup>9</sup>

21. While Indiana paints a picture of my incompetence and suspended me for incompetence in 2017, the Fourth Circuit U.S. Court of Appeals has never sanctioned me in 24 years and I remain a member of the bar of the Court of Appeals above this Court.<sup>10</sup>

22. I have asked this Court to put out this raging fire of discrimination against me with a simple recognition that the Virginia State Bar has exonerated me with a ***Last in Time*** ORDER. Dkts. 49-2, 58.

23. The DOJ of the Philippines has been watching this closely and has allowed me to stay in their country for 5 years with asylum seeker status because of how American courts (state and federal) have discriminated against me and injured

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<sup>8</sup> *Straw v. LinkedIn*, 5:22-cv-7718-EJD (N.D. Cal. 2023) (Dkt. 22-3)

<https://www.courtlistener.com/docket/66619947/straw-v-linkedin-corp/>

<sup>9</sup> *Straw v. LinkedIn*, Dkts. 22-32, 22-33.

<https://www.courtlistener.com/docket/66619947/straw-v-linkedin-corp/>

<sup>10</sup> <https://www.ca4.uscourts.gov/AttorneyBarAndECFStatus/rptN0046ActiveAttorneyss.pdf>



me with no means of legal recourse up to now, including ruining my law licenses with long suspensions not justified at all.<sup>11</sup>

24. My mother's cancer went into her **spine and brain** before killing her. My daughter's **spine** was injured and burdened her and her activities her entire childhood.<sup>12</sup>

25. Camp LeJeune's poisons hit the spine and brains of 3 generations of my family with horrific effects on health, career, family and personal relationships, absolutely every area of life for all 3 of us.

26. Before Indiana ripped into my law licenses<sup>13</sup> as retaliation for my own ADA complaints<sup>14</sup> about my former employer, I was licensed to practice law at either the state or federal level in six states (IL, IN, MD, VA, W. VA, NC, & SC). I

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<sup>11</sup> <http://cpa.andrewstraw.com>

<sup>12</sup> X-rays of Ava Straw before and after her spinal surgery in 2011 in Dunedin Hospital, New Zealand. Ava's NZ Health System National Number: **RND5435**



<sup>13</sup> <http://property.andrewstraw.com>

<sup>14</sup> *Straw v. LinkedIn*, Dkts. 22-5, 22-6.

documented how Indiana abused me with 58 exhibits in the *Straw v. LinkedIn* case.

27. I represented my mother's estate and my daughter in MDL-2218 and made virtually the same exact claim under FTCA that I am making here. I was allowed to do that because I was admitted to federal courts in Indiana and Illinois in 2014 & 2015. We lost when we should not have lost. The DOJ had the opportunity to do right by us as a family and individually, but Mr. Bain argued against us and the MDL court dismissed the case on 12/5/2016.

28. MDL-2218's legal errors were reversed with a new law, Camp LeJeune Justice Act.

29. I should be allowed to represent my mother's estate. I am the estate's administrator and have been for 9 years.

30. I should be allowed to represent my daughter, who authorized me to represent her for this damage nearly 10 years ago and no justice has come of it because of the attitudes of the DOJ attorneys.

31. Now that Congress and the president saw fit to overwhelmingly pass CLJA and reverse the arguments of Mr. Bain, I should be allowed to continue the representation without suffering from the legal disabilities caused by my former employer in Indiana, the Indiana Supreme Court.

32. This Court has full and absolute control over its own bar admissions and while what I am asking is outside of the Local Rules, this Court is not mandated to follow those rules when justice requires otherwise.

WHEREFORE, I ask this Court to set aside the Local Rules, Rule 83.1, et. al., and appoint me as counsel for my mother's estate (Estate of Sandra K. Stevens) and my daughter, Ava Straw, of Wellington, New Zealand with CLJA claims made to Navy JAG already. Our injuries all stem from the same source and reason as is the subject of my lawsuit here: our presence at Camp LeJeune for 19 months (583 days) when my father was stationed there, 1968-1970. Other law firms that have filed most of the claims and lawsuits under CLJA have simply refused to help this family with its litigation needs. No one is more loyal to this family than a member of it like me. Thank you for considering this law licensing and representation request.

I, *pro se plaintiff* Andrew U. D. Straw, verify that the above factual contentions and statements are true and correct to the best of my knowledge, information, and belief, on penalty of perjury. Signed: **October 21, 2023.**

Respectfully,



s/ ANDREW U. D. STRAW

712 H ST NE, PMB 92403  
Washington, D.C. 20002  
Telephone: (847) 807-5237  
andrew@andrewstraw.com



### CERTIFICATE OF SERVICE

I, Andrew U. D. Straw, certify that on **October 21, 2023**, I sent this **MOTION**. I sent this document with a **PROPOSED ORDER** via U.S. Mail to the Clerk of Court on **October 21, 2023**. CM/ECF will serve the defendants when the Clerk scans this document.

Respectfully submitted,

A handwritten signature in black ink, reading "Andrew U. D. Straw", written over a horizontal line.

s/ ANDREW U. D. STRAW  
*Pro Se Plaintiff*  
712 H ST NE, PMB 92403  
Washington, D.C. 20002  
Telephone: (847) 807-5237  
andrew@andrewstraw.com